TANK NOTES

STATE OF NEW MEXICO ENVIRONMENT DEPARTMENT



... A Newsletter from the Underground Storage Tank Bureau

Published by the New Mexico Environment Department and the Institute of Public Law

Vol. 9, No. 2 Summer 1996

UST Conference teams up with petroleum marketers' convention and expo

he Underground Storage Tank
Bureau of the New Mexico Environment Department will hold its 1996
Underground Storage Tank Conference in cooperation with the New

Mexico Petroleum Marketers Association (NMPMA) at the Inn of the Mountain Gods in Ruidoso. The conference will follow the NMPMA Convention and Expo. Two hundred attendees are expected for the topics, workshops, and panel presentations.

The UST Conference will take place September 10-11. Parallel sessions will focus on remediation and reimbursement topics, and facility

operations and management topics. Bureau staff, owners and operators, and experts will participate in the presentations. To register for this free conference, please send in the registration form on page 11.

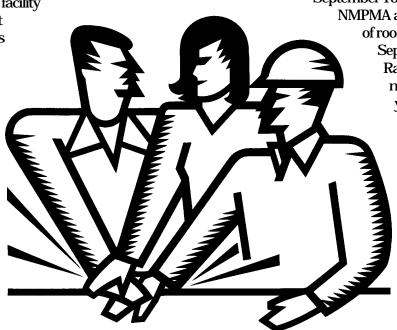
The UST conference offers educational benefits to the UST community. Continuing Education units are available for certified tank installers and certified scientists. Each can receive four hours

of Continuing Education credit for attendance. In addition, the UST Bureau will staff an educational booth for general information, reimbursement questions and problems. You may bring forms, problems, and paperwork to the booth.

Hotel Accommodations

Attendees are responsible for making their own hotel reservations. The conference hotel is the lnn of the Mountain Gods located two miles southwest of Ruidoso. A block of rooms has been reserved for





TANK NOTES

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This newsletter is for the UST owner/ operator population and is provided as a general information guide only. It is not intended to replace, interpret or modify manufacturers' protocols, or the rules, regulations or requirements of local, state or federal government, nor is it intended as legal or official advice. The opinions expressed in articles written by NMED staff are those of the authors and do not necessarily reflect those of NMED.

We welcome your comments and suggestions. Send address changes and correspondence to: New Mexico Environment Department, Underground Storage Tank Bureau, Harold Runnels Building, 1190 St. Francis Drive, P.O. Box 26110, Santa Fe, New Mexico 87502.

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New Lender Liability Regulations for USTs

by Felicia Orth, Office of General Counsel

he New Mexico Environment Department recently proposed for adoption new lender liability regulations for underground storage tanks in New Mexico. The Environmental Improvement Board adopted the regulations as proposed on April 12, 1996.

Tank upgrades must be completed by December 1998 and UST owner/operators may be looking for loans from commercial lenders. That loan may not be forthcoming if the potential lender is wary of default and the possibility of having to foreclose on an out-of-compliance tank.

The new regulations are designed to limit the regulatory obligations of lending institutions and other persons who hold a security interest in a UST or in real estate containing a UST, or that acquire title or a deed to a UST or a facility or property on which a UST is located. As a trade-off for this limitation of liability, lenders must, if no other operator exists after foreclosure, close the tanks in accordance with state closure requirements.

The equivalent federal regulations became effective December 6, 1995. A review of the federal rules showed them to be reasonably straightforward, so the state regulations adopt them by reference with a different effective date

EPA expects the rules to result in additional capital for UST owners, many of whom are small businesses: The funds should assist them in improving their facilities and meeting environmental requirements.

If, notwithstanding available lender liability protections, a lender or security interest holder chooses to exercise control over a tank and chooses to be called a UST owner/operator, it can still qualify for reimbursement.

More specifically, the new regulations provide as follows:

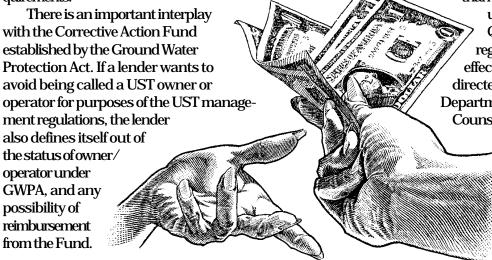
A "holder" (someone with indicia of ownership primarily to protect a security interest) is not an "owner" of a UST for purposes of compliance with UST technical standards, UST corrective action requirements, and UST financial responsibility requirements provided the person (a) does not participate in the management of the UST system (engage in management or control of decision-making related to the operation of the system, "operation" referring to the use, storage, filling and dispensing of petroleum), and (b) does not engage in petroleum production, refining and marketing.

A holder is not an "operator" of a UST after foreclosure if either (a) there is an operator other than the holder who is in control of the daily operation of the UST, or (b) if another operator does not exist, the holder empties all known USTs within 60 days, leaves vent lines open and functioning, and caps and secures all other lines, pumps, manways, and ancillary equipment. The holder must then also either permanently close the UST, or temporarily close the UST while maintaining corrosion protection, report suspected releases and conduct a site assessment in some cases (if the UST is closed for more

than 12 months and does not meet upgrade standards). Questions about the new

regulations, which become effective July 6, 1996, may be directed to Felicia Orth in the Department's Office of General Counsel, at 505-827-2854, 1190 St.

Francis Dr., P.O. Box 21190, Santa Fe, NM 87502. Copies of the regulations may be obtained from the UST Bureau at the same address.



24-hour notice for critical junctures

By Prevention/Inspection Staff

emember to notify the UST inspector in your area 24 hours prior to the performance of a critical juncture in the installation, repair, substantial modification (including installation of leak detection) or closure of a UST system. "Critical juncture" means:

- (1) in the case of an installation:
- (i) preparation of the excavation immediately prior to receiving backfill and the tank;
- (ii) setting of the tank and the piping, including placement of any anchoring devices, backfill to the level of the tank, and strapping, if any;
- (iii) any time during the installation in which components of the piping are connected;
- (iv) all pressure testing of the UST system, including associated piping, performed during the installation; and
- (v) completion of backfill and filling of the excavation;
- (2) in the case of a repair, internal lining or other substantial modification:

- (i) the completion of the excavation of existing tanks or piping;
- (ii) the actual performance of the repair, lining or modification;
- (iii) any time during the project in which components of the piping are connected; and
- (iv) any time during the project in which the tank or its associated piping is tested;
- (3) in the case of a tank removal or UST system closure:
- (i) the completion of the excavation of the tank or piping;
 - (ii) the cleaning and devaporizing of the tank;
- (iii) the actual removal of the tank from the ground or the filling of the tank in place; and
- (iv) the assessment of the tank site for releases.

If you have any questions, please call the inspector in your area before you begin work on your system. The UST inspectors' phone numbers are listed on page 2.

Sampling at tank removals

By Prevention/Inspection Staff

he UST
Regulations product,
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to measure for the presence of a release before closure is complete.

If the tank

By Prevention/Inspection Staff

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If the tank

By Prevention/Inspection Staff

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held gasoline product, measurement may be performed by taking soil samples for laboratory analysis using the appropriate methanol extraction method in conformance with the UST Soil/Water Sampling & Disposal Guidelines. Alternatively, if a UST inspector is present, the inspector may use an appropriate field testing instrument to detect the absence or amount of volatile petroleum product. If an inspector is not present, samples must be taken and analyzed in the laboratory.

If the tank held a product other than a gasoline product, the owner or operator must have soil samples collected from appropriate locations for laboratory analysis as described in the Guidelines.

Results of all analyses must be submitted to the UST Bureau field inspector to determine if a release has occurred. All samples above acceptable limits must be reported to the Remedial Action Section of the Bureau. The Guidelines should be consulted for field and laboratory analytical methodologies and protocols for both soil and ground water samples. Contact your local inspector or the UST Bureau in Santa Fe for a copy of the Guidelines.

[The only other way you can meet the "measure for a release" requirement is if you use vapor or ground water monitoring as your regular release detection method, the method is operating when you close your tank, and it indicates that no release has occurred.]

Competitive bidding for Minimum Site Assessments

By Shelda Sutton-Mendoza, Prevention/Inspection Program Manager

The Ground Water Protection Act was amended in 1995 to require that corrective action be competitively bid to be eligible for reimbursement from the Corrective Action Fund. Minimum site assessments are included in this rule but people have been asking whether an MSA has to be competitively bid if it is under \$10,000 and non-reimbursable anyway.

ompetitive bidding is required for a minimum site assessment (MSA) if the owner/operator is requesting payment for excess MSA costs from the Corrective Action Fund. Bidding is not required if reimbursement won't be requested.

MSAs are frequently costing less than the \$10,000 deductible. If the owner is not eligible for a reduced deductible under the "means test" and the MSA will cost less than \$10,000, the MSA is not subject to competitive bidding. It will not affect your eligibility for reimbursement for future cleanup costs as long as you bid the cleanup work out properly.

What happens if site conditions change and the MSA will cost more than \$10,000 after all? Since the part of the MSA that was not competitively bid is not eligible for reimbursement, it cannot be used as part of the deductible. Even if you spent \$9,000 before you found out the MSA would cost more than \$10,000, you cannot count any of that \$9,000 toward the deductible.

If the owner/operator is not seeking reimbursement for MSA costs, the work does not have to be supervised by a certified scientist.

Cathodic Protection Testers and Corrosion Experts

By Prevention/Inspection Staff

nderground storage tank owners and operators often ask the UST Bureau for a list of cathodic protection testers who are qualified to inspect and test, and corrosion experts who are qualified to

design and assess, cathodic protection systems.

The UST Bureau will be maintaining a list of qualified cathodic protection testers and corrosion experts. If you would like to be on one of these lists, please submit your name, statement of qualifications and resume to Shelda Sutton-Mendoza, New Mexico Environment Department, Underground Storage Tank Bureau, Harold Runnels Bldg., Rm. N-2150, 1190 St. Francis Drive, P.O. Box 26110, Santa Fe, New Mexico 87502.

Shelda, manager of the Bureau's Prevention/ Inspection Program, will review your resume and determine if you are qualified to be on the list. If you have any questions about the necessary qualifications, call Shelda at 827-2910.



Leak o' the Week

Date	Report Person	Phone
Jul 1-5 Jul 8-12 Jul 15-19 Jul 22-26 Jul 29-Aug Aug 5-9 Aug 12-16 Aug 19-23 Aug 26-30 Sep 2-6 Sep 9-13 Sep 16-20 Sep 23-27	Jane Cramer Kalvin Martin David Nye Norman Pricer 2chris holmes Steve Jetter Jane Cramer Kalvin Martin David Nye Norman Pricer chris holmes Steve Jetter	841-9477 841-9186 841-9478 841-9465 827-2916 841-9461 841-9477 841-9478 841-9465 827-2916 841-9461 841-9477 841-9478
Oct 21-25	chris holmes	827-2916

This article is excerpted from Marcel Moreau's column, Tank-nically Speaking, in the December 1994 issue of *LUSTLine*. *LUSTLine* is published by the New England Interstate Water Pollution Control Commission under a grant from U.S. EPA. The two parts of Moreau's article not included are on regulatory requirements and cost. Contact the UST Bureau if you have any questions about regulatory requirements.

What Every Tank Owner Should Know About Overfill Prevention

by Marcel Moreau

and installers, I become ever more painfully aware that there is a clear and present dearth of information about the workings of overfill prevention equipment. As I search my library for information about overfill devices, I find, too, that there is precious little written about how they work and how they interact with the delivery personnel they affect and the storage systems they inhabit. Ergo...I will hereby attempt to plug this information gap by putting forth a basic primer on overfill prevention. I suggest that you grab a cup of coffee, settle into your chair, and put your thinking caps on...

s I wander the country talking to tank

owners and operators, regulators,

Some Basic Facts about Fuel Deliveries

To better understand how overfilling occurs and how to prevent it, let's review some relevant facts about how deliveries are made into underground motor fuel storage tanks.

• The volume of fuel delivered into the tank is metered when it is loaded into the tanker truck but not when it is transferred into the underground storage tank. Fuel transport trucks are compartmentalized so that they can carry different grades and quantities of fuel. When a driver hooks up to a tank, he plans to deliver the entire contents of each fuel compartment into its appropriate tank. The driver calculates the amount of ullage (empty space in the tank) by gauging the tank with a stick and referring to a tank chart. He needs to know that the ullage volume is greater than the volume of the truck compartment that will be emptied into the tank. In general, flow

from the tank truck to the UST is by gravity; no pumps are involved. Typical flow rate is about 400 gallons per minute.

- Deliveries into smaller tanks typically involve pumping the product into the tank. In this case, the amount of fuel that is delivered is metered at the tank and only alarms and devices specifically designed for pressurized deliveries can be used. Unless otherwise indicated, this discussion will deal exclusively with gravity deliveries.
- A typical delivery hose is 4 inches in diameter and 20 feet long and has a volume of about 14 gallons.
- Delivery hoses usually connect to fill pipes with an airtight connection known as a "tight fill." Older, smaller tanks may be filled by simply inserting a length of pipe into the tank fill pipe. This is known as a "loose fill." Only overfill prevention alarms can be used with loose fills.
- There is only one valve in the tanker-to-tank delivery path. This valve is located under the belly of the tanker. There are no valves at either end of the delivery hose itself.
- Fire codes require drivers to stand by their vehicles while they make deliveries.

How Does a Delivery Spill Occur?

Typically, a spill during a delivery occurs through some miscalculation (i.e., when the driver attempts to drain a compartment of the tanker that contains more product than there is room for in the tank). In the absence of any overfill prevention devices, the driver ends up with a tank chock full of product, vent lines that are full of product up to the level of product in the truck, and a delivery hose that is full of product. The only valve in the system is the one under the belly of the tanker, so the 14 gallons of product in the hose and the product in the vent line can neither be returned to the tanker truck nor stuffed into the UST.

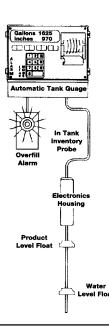
The driver's options are either to wait for customers to buy enough product from the UST to empty the vent lines and hose or to disconnect the hose and drain its contents into the manhole around the fill pipe. All too often, the latter option is the most expedient. In the days before tank regulation, the fill pipe manhole had no bottom, and the product drained directly into the environment, producing that all too familiar phenomenon: soil contamination around the fill pipe.

So, What's the State-of the-Art in Overfill Prevention?

Although fill pipe manholes on new tanks are liquid tight, the volume of the hose (14 gallons) is roughly three times the volume of the typical spill containment manhole (5 gallons) around the fill pipe. Spill containment manholes (spill buckets) are great for catching minor drips that may result when the delivery hose is disconnected from the UST, but they are not the answer to overfill prevention.

The solution to the tank overfill problem is to stop or severely limit the flow of product into the tank before the tank is overfilled, so that product levels never rise into the vent lines and adequate room is left in the tank for the contents of the hose. The ability to drain the contents of the hose quickly and easily is also important to successful overfill prevention.

Let's look at the technologies, [...] operational characteristics, advantages, and problems associated with the three common approaches to overfill prevention.



Alarms

larms are the least frequently used of the overfill prevention technologies. A typical UST overfill alarm is tied into an automatic tank gauging system. Most automatic tank gauges have the ability to trigger a remote alarm when the liquid level in the tank reaches a programmed level.

Operational Characteristics

When an alert driver hears an overfill alarm, he has 60 seconds to respond by shutting off the delivery valve (or valves, if more than one tank is being filled) that are open. If the driver is alert and conscientious and standing close to the valve, he can close the valve in this time frame. After he has shut the valve, the driver should silence the alarm to restore quiet to the neighborhood. Draining the contents of the hose into the tank is simply a matter of disconnecting it at the truck and holding it in the air until it drains. The hose should drain in a few seconds.

Advantages

Overfill alarms do not slow down the flow of product into the UST. They provide the most rapid hose draining capability relative to other overfill prevention devices. They can be used with gravity drop or pressurized deliveries and even loose fills.

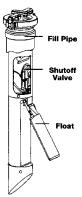
Cautions

The most serious deficiency of alarm systems is that most often the alarm itself is remote from the tank fill pipes and bears absolutely no label to identify it as an overfill device. Furthermore, the tank fill pipes are generally not labeled to indicate to the driver that an overfill alarm is installed at the facility. As a result, when the alarm sounds, the driver is more likely to think that a car theft alarm has gone off than that his tank is about to overfill.

Alarms must be located in the vicinity of the tank fill pipes, clearly visible from where the driver is likely to be standing, and clearly labeled as an overfill protection device with words like: "When alarm sounds STOP DELIVERY IMMEDIATELY." Unless it is properly located and identified, an overfill alarm is not likely to effectively warn the driver of the impending overfill.

The driver must be present and alert in order for the overfill alarm to be effective.

Drop Tube Devices



hese devices replace a section of the drop tube, a thin aluminum tube that is inserted into the tank fill pipe and extends nearly to the tank bottom. There is usually a float-activated mechanism on the outside of the tube that releases a valve inside the tube that is forced shut by the flow of product. Typically, there is a bypass valve that allows a small amount of product to flow (5 to 10 gallons per minute) after the main valve closes. The

bypass valve allows the hose to be drained after the main valve closes. If the delivery is allowed to continue (10 minutes or so after the main valve closes), the bypass valve also closes and the delivery hose can no longer be drained into the tank until the tank liquid level is lowered

Operation

As the primary valve is slammed shut by the force of the product flowing by, it creates a hydraulic shock, which typically causes the flexible delivery hose to "jump." The alert delivery driver notices this "jump," closes the delivery valve, and proceeds to drain the delivery hose through the bypass valve. Because flow is restricted initially to the bypass opening, the draining of the hose should take a minute or so.

Advantages

Drop tube devices allow the largest percentage of the tank capacity to be used. They are easy to retrofit on existing tanks, as long as the fill pipe goes straight into the tank.

Cautions

The sudden closing of the valve puts great stress on the delivery system. The hose connections to the tank and truck must be secure or they may pop off, creating a significant surface spill. The drop tube must be firmly attached to the fill pipe, and the shut off device itself firmly attached to the drop tube, or else the tube can become a spear directed at the bottom of the tank, and may pierce it.

If the driver is not near the delivery truck, he may return to a situation where the delivery hose is full of product and the bypass valve has closed. He is now faced with the old dilemma of waiting for

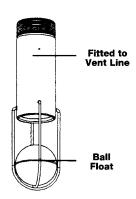
customers to buy product and lower the liquid level in the tank or trying to drain a 14-gallon hose into a 5-gallon spill containment manhole.

Fill pipe devices intended for underground storage tank use are designed for gravity deliveries only. If a delivery is made under pressure and the device activates, something is likely to break.

There must be a tight fill connection between the tank and the delivery hose, or else the fill pipe device will create a surface spill when the valve closes and the product has nowhere to go but up.

The valve mechanism must lift out of the way once the hose is removed so that the driver can stick the tank after delivery. Otherwise, the device is likely to be damaged by a frustrated driver trying to insert a gauge stick into the tank.

Vent Line Devices



ent line devices are commonly known as "ball-float valves" or "float vent valves." They are perhaps the most commonly used type of overfill prevention. They consist of a short length of pipe that extends down into the top of the tank from the vent opening. There is typically a wire cage fastened to the lower end of

the pipe that contains a hollow metal ball. When the liquid level in the tank reaches the ball, the ball floats up and blocks the end of the pipe, blocking the vent opening. Also typical in this arrangement is a 1/8- or 1/16- inch vent hole in the pipe placed there to relieve the pressure in the tank. Manufacturers' recommendations and industry recommended practices require that float-vent valves be installed in extractor fittings to allow for the maintenance and inspection of these devices.

Operation

Because of the compression of the ullage that occurs when the float vent valve closes, the delivery flow into the tank reduces slowly, and there is no hydraulic shock. Consequently, there is no hose "jump" and no way for the driver to know that the float-vent valve has closed. The driver becomes aware that something is awry because the delivery seems to be

taking too long. By looking at the observation window in the delivery hose, the driver will see that the hose is full of product. In addition, the driver can feel the hose to tell that the product is not flowing.

At this point the driver can close the delivery valve under the belly of the truck to stop the delivery. However, in order for the hose to drain, the compressed air in the ullage space must be allowed to vent through the small hole in the float vent valve. If the driver attempts to disconnect the hose before the pressure has been relieved, the pressure will push the product up through the drop tube and the delivery hose and into the driver's face. To avoid such an incident, the driver must wait 30 minutes or more for the pressure to be relieved. After the pressure is relieved, complete draining of the hose will take several more minutes.

Advantages

I cannot think of any operational advantages of the float-vent valve. They are often thought to be the cheapest form of overfill prevention, but the economic gains are small unless they are installed without extractor fittings. An extractor fitting, riser, and manhole are required to allow inspection and maintenance, but these parts are sometimes unwisely omitted.

Cautions

Float-vent valves must not be used with pressurized deliveries because, should the float-vent valve close, the pressure in the tank will rise 10 to 20 times above the tank's design pressure, a situation that has resulted in tank ruptures.

For the float-vent valve to operate properly, the top of the tank must be air tight. Tank-top tightness is most often compromised these days by the drain mechanisms of spill containment manholes. If the drain mechanism is not airtight, it will become the

vent for the tank when the float-vent valve closes, releasing potentially explosive vapors at ground level. In fact, some drivers have learned to bypass float-vent valves by opening the spill containment manhole drain, thus venting the tank through this opening. This practice is very dangerous.

Float-vent valves should not be used with retail suction pumping systems, because the increased pressure in the tank can push product out through the air eliminator at the dispenser, causing a spill at the fuel island.

Float-vent valves are not compatible with coaxial Stage I vapor recovery as the float vent valve does not block the vapor return path around the drop tube, and so after an overfill, the driver ends up with both the delivery hose and the vapor return hose full of product with no place to go.

Float-vent valves will not work with loose fills.

The Bottom Line

I this point, you may have the impression that I haven't an abundance of warm and fuzzy feelings about the current state-of-the-art in overfill prevention. Well, you're right! If I were faced with the prospect of having to install overfill prevention, I'd probably go with a shut-off device, but I would want to be sure that my delivery person(s) knew that these devices were installed, how they worked, and at what liquid level they were set to trigger.

The major stumbling block in overfill prevention is that delivery personnel are expected to know this information through some magical osmotic process. The fact is that delivery personnel (and installers) need some cold hard information on how overfill prevention devices work if they are going to prevent overfills effectively.



THE BUREAU WISHES OUR TANK NOTES READERS
A HAPPY INDEPENDENCE DAY!

Coming Soon: Revision of the UST Regulations and Risk-Based Corrective Action

BY ANNA RICHARDS

here is significant regulatory changes in progress in New Mexico and across the country toward recognizing the need for alternative methods to establish priorities for management of soil and ground water cleanup at contaminated sites. The state Environment Department is aiming to incorporate more risk-based decision-making into its underground storage tank regulations governing corrective action at leak sites. Selecting a remedial action plan for a leak site and setting target cleanup levels are some of the important decisions that will be affected by considering toxicity and risk at each site. A benefit will be that Corrective Action Fund dollars will be better targeted to pay for active cleanup of contamination that threatens public health and the environment, whether at state-lead or responsible party-lead sites.

The American Society for Testing and Materials (ASTM) has published a standard for Risk-Based Corrective Action at Petroleum Release Sites. Endorsed by the US Environmental Protection Agency, the ASTM standard is flexible in that it provides a framework for states to use in developing their own approaches. This is necessary because each state has its own priorities as

set forth in its constitution, statutes and regulations. New Mexico requires protection of aquifers for present and reasonably foreseeable future use. Nearly 90 percent of New Mexicans rely on ground water to meet some or all of their drinking water needs.

The New Mexico Water Quality Control Commission sets surface and ground water quality standards for New Mexico. Alternate standards may be requested under the recently adopted abatement regulations, described in the Winter 1996 Tank Notes.

The Department is taking advantage of training and expertise made available by the regulated community and USEPA and ASTM as it develops its approach. The New Mexico approach for risk-based corrective action at petroleum release sites is under development now and comments are being, and will continue to be, solicited from interested parties. The approach will address soil and ground water remediation and will result in changes to the UST Regulations. See the public meeting announcement below.

Tank Notes will keep readers informed of new developments. Contact Anna Richards at 827-9685 for further information.



The Department will hold an informal public meeting on UST reg revisions on July 10 beginning at 1 p.m. The meeting will be held in the Council/Commission Chambers at the City/County Building, One Civic Plaza in downtown Albuquerque. UST Bureau staff will talk about possible changes to the UST regs and hear comments and suggestions. Everyone is encouraged to attend.



1996 UST CONFERENCE IN COOPERATION WITH THE NEW MEXICO PETROLEUM MARKETERS ASSOCIATION INN OF THE MOUNTAIN GODS RUIDOSO, NEW MEXICO, SEPTEMBER 10 - 11, 1996

SEPTEMBER 10, 1996

1:00 -1:30 p.m.Registration

1:30 - 2:00 PM OPENING REMARKS: "MOVING INTO THE 21ST CENTURY"
MARK WEIDLER, SECRETARY, NEW MEXICO ENVIRONMENT DEPARTMENT
PETE MAGGIORE, DIRECTOR, ENVIRONMENTAL PROTECTION DIVISION

CONCURRENT SESSIONS:

2:00 - 5:30 PM DON'T WAIT TILL '98 - PRESENTATION FROM CONTRACTORS ON OPTIONS for UPGRADES.

PANEL DISCUSSION with OWNERS ON UPGRADE OPTIONS.

CORRECTIVE ACTION/REIMBURSEMENT

2:00 - 3:30 PM INNOVATIVE TECHNOLOGIES - ROUND TABLE
4:00 5:30 PM NEW APPROACHES TO REMEDIATION - RISK BASED CORRECTIVE ACTION
5:30 - 7:00 PM SOCIAL HOUR/NO HOST BAR

SEPTEMBER 11, 1996

Concurrent Sessions:

8:00 - 10:00 AM WHAT'S NEW IN RELEASE DETECTION 10:30 - 12:00 PM HOW TO SURVIVE A COMPLIANCE INSPECTION

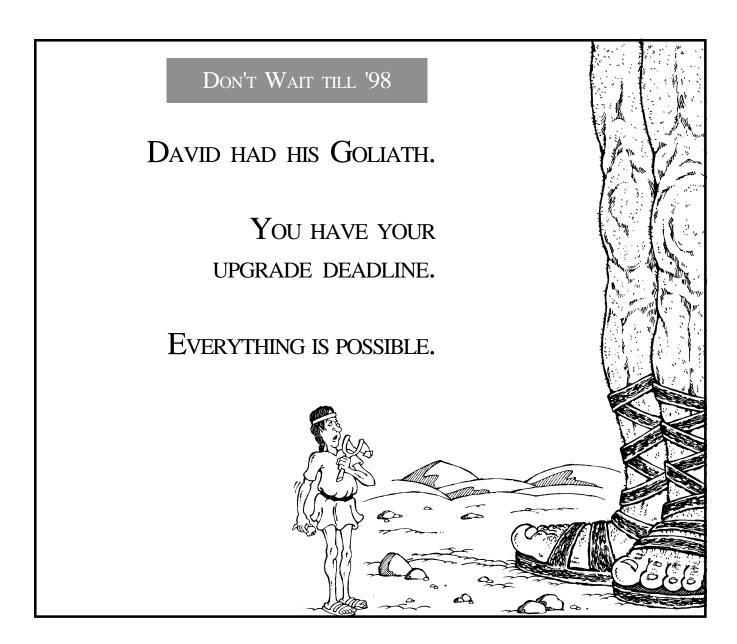
CORRECTIVE ACTION/REIMBURSEMENT

8:00 - 10:00 AM REIMBURSEMENT WORKSHOP 10:30 - 12:00 PM NEW REGULATORY INITIATIVES

Registration Form

Yes! Register me for the 1996 Underground Storage Tank Conference to be held at the Inn of the Mountain Gods, Ruidoso, New Mexico, September 10-11, 1996. There is no registration fee.

Name:		
Affiliation:		
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City, state, ZIP:	I would like Education credits installers.	for certified
Mail to: 1996 UST Conference UST Bureau -nmed P.O. Box 26110 Santa Fe, NM 87502-6110	I would like Education credits scientists.	Continuing for certified



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